

# Massachusetts Electric

A **National Grid** Company



Amy G. Rabinowitz  
*Counsel*

March 2, 2004

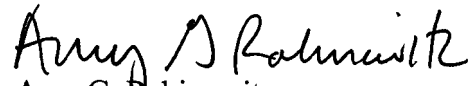
Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

**Re: D.T.E. 03-88D**

Dear Secretary Cottrell:

I am enclosing Massachusetts Electric Company's Petition for Limited Participant Status in the above captioned proceeding.

Very truly yours,

  
Amy G. Rabinowitz

cc: John Geary, Hearing Officer  
Gary Epler, Esq.

25 Research Drive  
Westborough, MA 01582-0099  
Phone 508.389.2975  
Fax: 508.389.2463  
amy.rabinowitz@us.ngrid.com

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

)  
Fitchburg Gas and Electric Light Company

D.T.E. 03-88D

**PETITION FOR LIMITED PARTICIPATION STATUS OF  
MASSACHUSETTS ELECTRIC COMPANY**

Massachusetts Electric Company (“MEC” or the “Company”) hereby submits this petition to the Department of Telecommunications and Energy (“Department”) for permission to participate as a limited participant in the above-captioned proceeding, pursuant to 220 CMR .02(1)(e). The Company states the following in support of its petition:

MEC is a Massachusetts electric company subject to the regulatory jurisdiction of the Department with a principle place of business at 55 Bearfoot Road, Northborough, Massachusetts 01532.

2. MEC provides electricity service to customers in 168 cities and towns in Massachusetts.
3. On February 17, 2004, the Department issued an Order of Notice and Notice of Public Hearing and Procedural Schedule stating that any person wishing to participate in the above-captioned proceeding must file a petition with the Department by March 2, 2004.
4. In conducting adjudicatory hearings, the Department may “allow any person showing that he may be substantially and specifically affected by the proceeding to

intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any other limited purpose” as the Department may order. Mass. Gen. Laws, c. 30A, § 10; see also 220 CMR 1.03(1)(b).

5. MEC has an interest in participating in this proceeding because it addresses issues relating to cost components to be included in the calculation of default service rates.

Many of the issues raised in this proceeding will be similar to issues raised in proceedings concerning MEC, including, specifically D.T.E. 03-88E.

6. Department precedent supports the participation of regulated utilities in regulatory proceedings of other utilities when important policy matters of significant precedential value are under review. *Massachusetts Electric Company*, D.T.E. 98-69 (review of alternative streetlighting tariff); *Boston Edison Company*, D.T.E. 97-86 (sale of electric generating plants); *Massachusetts Electric Company*, D.P.U. 96-25 (review of electric restructuring settlement); *Boston Gas Company*, D.P.U. 96-50 (review of performance-based ratemaking proposals); *Cambridge Electric Light Company/Commonwealth Electric Company*, D.P.U. 91-234-A (integrated resource management proceeding); *NYNEX*, D.P.U. 94-50 (alternative regulation/performance-based regulation plan).

7. Given its position as a Massachusetts regulated utility, MEC may have information that will aid the Department in its evaluation of this proceeding.

8. MEC requests that all notices, testimony, pleadings and correspondence pertaining to this proceeding be directed to the persons identified below

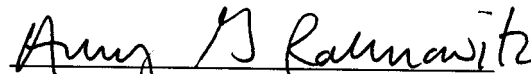
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Counsel  
Massachusetts Electric Company  
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amy.rabinowitz@us.ngrid.com

9. In the event that MEC is granted limited intervention status, MEC will accept whatever procedural schedule is proposed, and does not intend to burden the record in this proceeding.

WHEREFORE, MEC respectfully requests that the Department allow its petition for limited participation status in this proceeding.

Respectfully submitted,

MASSACHUSETTS ELECTRIC COMPANY  
By its attorney,

A handwritten signature in cursive script, reading "Amy G. Rabinowitz", written over a horizontal line.

Amy G. Rabinowitz  
25 Research Drive  
Westboro, MA 01582

Dated: March 2, 2004

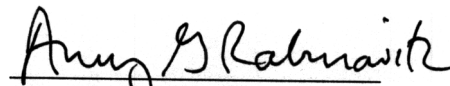
**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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\_\_\_\_\_) )  
Fitchburg Gas and Electric Light Company

D.T.E. 03-88D

**CERTIFICATE OF SERVICE**

I certify that on this day, I have served a copy of the Petition for Limited Participant Status of Massachusetts Electric Company on Gary Epler, 6 Liberty Lane West, Hampton, NH 03842 by first-class and electronic mail.

  
\_\_\_\_\_  
Amy G. Rabinowitz

Dated: March 2, 2004